



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-3

September 5, 2002

Jerome Grossman, Treasurer  
Peace Political Action Committee  
110 Maryland Avenue, NE  
Washington, DC 20002

Identification Number: C00155119

Reference: February Monthly (1/1/02-1/31/02), March Monthly (2/1/02-2/28/02)  
and April Monthly (3/1/02-3/31/02) Reports

Dear Mr. Grossman:

This letter is to inform you that as of September 4, 2002, the Commission has not received your response to our requests for additional information dated August 14, 2002. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

An adequate response must be received at the Commission by September 25, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Jane Parks on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Jerome Grossman, Treasurer  
Peace Political Action Committee  
110 Maryland Avenue NE  
Washington, DC 20002

AUG 14 2002

Identification Number: C00155119

Reference: April Monthly Report (3/1/02-3/31/02)

Dear Mr. Grossman:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses the apparent disbursement of earmarked contributions outside the permissible time period. As a conduit or intermediary for an authorized committee, your committee must forward any earmarked contribution, along with a transmittal report, no later than ten (10) days after receiving the earmarked contribution. 11 CFR §§102.8(a) and (c) and 110.6(c)(1)(iii)

If the earmarked contributions were incompletely or incorrectly disclosed, you should amend your report with clarifying information.

Although the Commission may take further legal action regarding the untimely forwarding of earmarked contributions, your prompt action in addressing the concerns raised will be taken into consideration.

-Schedule B supporting Line 23 of your report discloses one or more contributions to a candidate(s) for the California Primary election; however, the funds were disbursed after the election date(s) (pertinent portion(s) attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be used to reduce a candidate committee's debts incurred during that election campaign.

## PEACE POLITICAL ACTION COMMITTEE

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If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule B supporting Line 21(b) of your report discloses a payment(s) to another political committee(s) for goods and/or services provided by that committee(s). 11 CFR §100.7(a)(1)(iii)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(1)(iii)(B)

Please clarify whether your committee was assessed the usual and normal charge for the goods and/or services you received and explain the steps the political committee(s) took in determining the amount(s) charged to you. If your committee was provided the goods and/or services at less than the

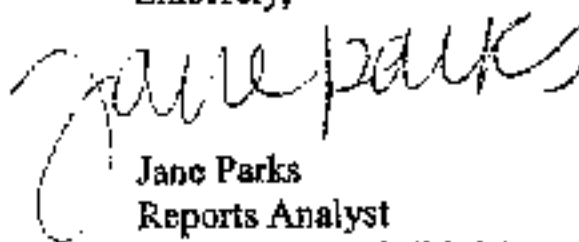
## PEACE POLITICAL ACTION COMMITTEE

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usual and normal charge, the difference between the two is considered to be an in-kind contribution by the political committee(s) to your committee and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(1)(iii)(A))

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Jane Parks  
Reports Analyst  
Reports Analysis Division

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**SCHEDULE B (FEC Form 3X)**  
**ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)  
 for each category of the  
 Detailed Summary Page

 FOR LINE NUMBER:  
 (check only one)

PAGE 225 / 244

<input type="checkbox"/> 21a	<input type="checkbox"/> 22	<input checked="" type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c
<input type="checkbox"/> 29				

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

PEACE POLITICAL ACTION COMMITTEE

Full Name (Last, First, Middle Initial)

**A. LUTHER FOR CONGRESS VOLUNTEER COMMITTEE**

Mailing Address

1380 GENEVA AVENUE NORTH SUITE 20

City

OAKDALE

State

MN

Zip Code

55128

Purpose of Disbursement

In-kind: Postage &amp; Mailhouse

Candidate Name

BILL LUTHER

Category/  
Type

Office Sought:

☒ House☐ Senate☐ President

Disbursement For:

2002

☒ Primary☐ General

Other (specify) ▼

State: MN

District: 08

Date of Disbursement

03 / 27 / 2002

Amount of Each Disbursement This Period

221.73

[MEMO ITEM]

Transaction ID: SB23.6552.1

Full Name (Last, First, Middle Initial)

**B. BARBARA LEE FOR CONGRESS**

Mailing Address

1736 FRANKLIN STREET #500

City

OAKLAND

State

CA

Zip Code

94612

Purpose of Disbursement

In-kind: Postage &amp; Mailhouse

Candidate Name

BARBARA LEE

Category/  
Type

Office Sought:

☒ House☐ Senate☐ President

Disbursement For:

2002

☒ Primary☐ General

Other (specify) ▼

State: CA

District: 09

Date of Disbursement

03 / 27 / 2002

Amount of Each Disbursement This Period

561.19

[MEMO ITEM]

California Primary  
03/05/02

Transaction ID: SB23.6552.2

Full Name (Last, First, Middle Initial)

**C. FOX FOR CONGRESS**

Mailing Address

PO BOX 467

City

GREENSBURG

State

IN

Zip Code

47240

Purpose of Disbursement

In-kind: Postage &amp; Mailhouse

Candidate Name

MELINA FOX

Category/  
Type

Office Sought:

☒ House☐ Senate☐ President

Disbursement For:

2002

☒ Primary☐ General

Other (specify) ▼

State: IN

District: 06

Date of Disbursement

03 / 27 / 2002

Amount of Each Disbursement This Period

561.19

[MEMO ITEM]

Transaction ID: SB23.6552.3

SUBTOTAL of Disbursements This Page (optional)

0.00

TOTAL This Period (last page this line number only)

22.03.22.30.73